

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

Robert P. Carr	:	
And Jennifer L. Carr	:	
	:	Docket No. 18-11673
	:	
Freedom Mortgage Corporation	:	Chapter 13
Movant	:	
Vs.	:	
	:	
Robert P. Carr	:	
And Jennifer L. Carr	:	
Respondent	:	
And	:	
Scott Waterman, Esquire	:	
Trustee	:	

RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW, come the Respondents, Robert and Jennifer Carr, by and through their undersigned counsel, Michael J. McCrystal, Esquire and aver:

1. Admitted.
2. Admitted.
3. After reasonable investigation, debtor cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied pursuant to the Federal Rules of Bankruptcy Procedure. To the extent that an answer is deemed to be required, the same is specifically denied and it is averred to the contrary.

4. After reasonable investigation, debtor cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied pursuant to the Federal Rules of Bankruptcy Procedure. To the extent that an answer is deemed to be required, the same is specifically denied and it is averred to the contrary.
5. Admitted.
6. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is required, it is averred that debtor has or will have at the time of this hearing *infra* made all required payments under the Note and Security Interest.
7. After reasonable investigation, debtor cannot admit or deny the truth or falsity of this averment and the same is deemed to be denied pursuant to the Federal Rules of Bankruptcy Procedure. To the extent that an answer is deemed to be required, the same is specifically denied and it is averred to the contrary.
8. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is required, it is averred that debtor has or will have at the time of this hearing *infra* made all required payments under the Note and Security Interest.
9. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is required, it is averred that debtor has or will have at the time of this hearing *infra* made all required payments under the Note and Security Interest.
10. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is required, it is averred that debtor has or will have at the time of this hearing *infra* made all required payments under the Note and Security Interest.
11. Denied as a conclusion of law to which no responsive pleading is required pursuant to the Federal Rules of Bankruptcy Procedure. To the extent an answer is required, it is averred that debtor has or will have at the time of this hearing *infra* made all required payments under the Note and Security Interest.

WHEREFORE, Respondent prays this Honorable Court to deny the Motion for Relief from the Automatic Stay and for such other and further relief as this Honorable Court will deem just and equitable.

Respectfully submitted,

/s/ Michael J. McCrystal

Michael J. McCrystal, Esquire

Supreme Court ID No. 55064

326 Main Street, STE 1

Emmaus, PA 18049

610 262-7873